Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of	)	
	)	
Review of the Commission's Part 95 Personal	)	WT Docket No. 10-119
Radio Service Rules	)	

Comments to the Notice of Proposed Rule Making

We are writing in response to the posting of the proposed rules changes for Personal Radio Services, specifically the changes to parts related to General Ground Mobile Radio Service (GMRS). We recognize that there are many items under review, but we are commenting on items which will impact our public service application:

- We do not agree with any proposed rules changes addressing reduction of power, in both hand held and mobile radios, as this will significantly affect the ability for providing communications.
- We do not agree with proposed rule changes that would restrict GMRS repeater operations.
- We do not agree with the proposed new rules regarding geographic restrictions
- We do not agree with proposed rules for Narrowbanding GMRS Channels
- We are in partial agreement with some of the suggestions for licensing changes.
- We are in partial agreement with the proposed eligibility changes

Background

We are a coalition of neighborhood organizations that have created a citizen based disaster response system call the Emergency Communications Hubs. We are located in Seattle, Washington, and our hub systems are grouped by geographic areas and known by their neighborhood names (e.g. West Seattle Emergency Communication Hubs, Queen Anne/Magnolia Hubs, Wallingford Hubs, etc). We are sponsored and supported by our various local community organizations, such as Sustainable Wallingford, the Southwest and Delridge District Council and the Magnolia / Queen Anne District Council. While our efforts are localized, we operate also at a citywide level, with liaison through the City of Seattle Office of Emergency Management. Both the local groups and the City of Seattle are helping new neighborhoods establish their own Hub systems, and we have a leadership council to sustain those efforts. It is that leadership council that is responding to the proposed rules changes.

We formed this Hub system because Seattle is in a major earthquake fault zone. In some cases, entire geographic areas of the city could be isolated if major bridges were

to collapse. After the 2001 Nisqually Earthquake, local community groups began to search for a way to encourage citizen preparedness and commitment to emergency preparedness. A serious windstorm in 2006 crystallized the type of community wide structure that was needed and the Hubs network concept was created.

Operationally, each of the Hub networks has a series of Hub locations established. In the event of a serious emergency, when power, communications and public services are affected, the neighborhood would activate their individual Disaster Response Plan. Each Hub has a leader, who is equipped with a communications "go bag", and they would set up their Hub location for operation. The Hub is a place where neighbors can go to report problems and ask for help, or offer help and share resources. The Hubs within each neighborhood area are linked by a GMRS repeater system and each leader is a licensed GMRS operator. Some needs can be filled locally, but if not, the leader can request (or offer) help from the other neighborhood Hubs. Each neighborhood group of Hubs is also connected to the City of Seattle's Office of Emergency Management through the Seattle Auxiliary Communications Service (ACS), which is the amateur radio operators registered as emergency workers with the City. Our role is essential in collecting neighborhood level information through our GMRS network and passing it via ACS to the City so the city departments can create a comprehensive response to any disaster.

We have three GMRS repeaters that cover most of the City of Seattle. Attachment 1 shows the coverage area of those repeaters. We do not believe that cell phone or internet systems will be a dependable way to communicate in the first few days of a disaster. We have tried to establish a citywide system of redundancy with those repeaters. The funding for 26 Hubs in the first 3 neighborhoods, including radios and repeaters, was acquired in 2009 through a one-time budget allocation from the Seattle City Council Regional Development and Sustainability Committee.

With that context, here are our comments on the proposed rules changes.

<u>GMRS Portable Devices Paragraphs 31 – 35.</u>
We need to retain the power limits as they exist today. We initially wanted to use Family Service Radios (FRS), as that would have been a cheap and readily available solution for us. All three of the original Hub networks conducted propagation tests and none were successful with FRS. Please see attachment 2 for an example of our results.

<u>Paragraph 34 (Elimination of Repeaters)</u>
We completely disagree with the question posed in Paragraph 34, asking if repeaters should be eliminated. Our repeaters operate at 35 watts. We would have to reconfigure our system to operate without repeaters, and we know from testing without the repeaters that coverage with 5 watt radios is spotty. See attachment 3 for an example of testing results.
In addition, our Channel 6 (Capitol Hill Repeater) is set on the national emergency frequency 462.675 MHz with the national travel tone of 141.3 Hz. Coverage of this

repeater is from NW 145th St at the North Seattle city limit down to Southcenter Mall in Tukwila, WA on I-5, and from the junction of I-5 and I-90 over to milepost 11 on I-90. This allows GMRS users to call for help while on the freeway system in and around Seattle.

Proposed new paragraph 95.35 (b)(2) Geographic Restriction

This would completely dismantle our repeater network and restrict our mobility, as we are north of Line A. As stated before, this would cause a complete reconfiguration of our system. Loss of our 35 watt repeaters would severely impact direct Hub to Hub communications in our geographically challenging areas. Loss of the 50 watt mobile units dismantles our backup system, should a Hub location be too dangerous to operate from, or should we need additional field communication in unplanned places.

Narrowbanding GMRS Channels, Paragraphs 36 – 37

If this rule change is adopted, we would have to replace over 25% of our radios at a cost of $140 apiece. This would constitute a severe financial burden on our all-volunteer efforts. We were very fortunate to get the small City of Seattle allocation when we did, as there is no additional money forthcoming in the foreseeable future, given current economic conditions.

Station Licensing, Paragraphs 24 – 28

We have mixed reactions to this set of proposed changes. We believe that licensing of GMRS should remain, but approve of extending the license period to be 10 years. Holding licenses on one hand limits the number of volunteers who would be radio operators in our system, but it reinforces the importance of this role in our Hub structure by adding to a person's responsibility. Licensing would also restrict the number of operators in an area to serious radio operators, as opposed to FRS, and thus the channels would remain less congested in an emergency situation. This will help with orderly, effective radio operations during disaster response. However, we would also be quite happy if the Rules would be modified to reduce the GMRS licensing fee to be comparable with Amateur licensing fees.

Eligibility Paragraphs, 29 – 30.

We highly support the removal of age restrictions. We have Boy Scouts who are part of one Hub response group, and this would enable the Scouts to have GMRS licenses, not just the Scoutmaster.

Regarding licensing businesses, we believe the proposed change to allow businesses to use this portion of the spectrum not be in the best public interest. We have already encountered sizable encroachment on the GMRS frequencies by unlicensed operators conducting business operations. This has, on occasion, interfered with our weekly radio check-in activities, so we can see that businesses are searching for free frequencies. They have been allocated another part of the spectrum already, they should remain in those designated frequencies.

In Summary

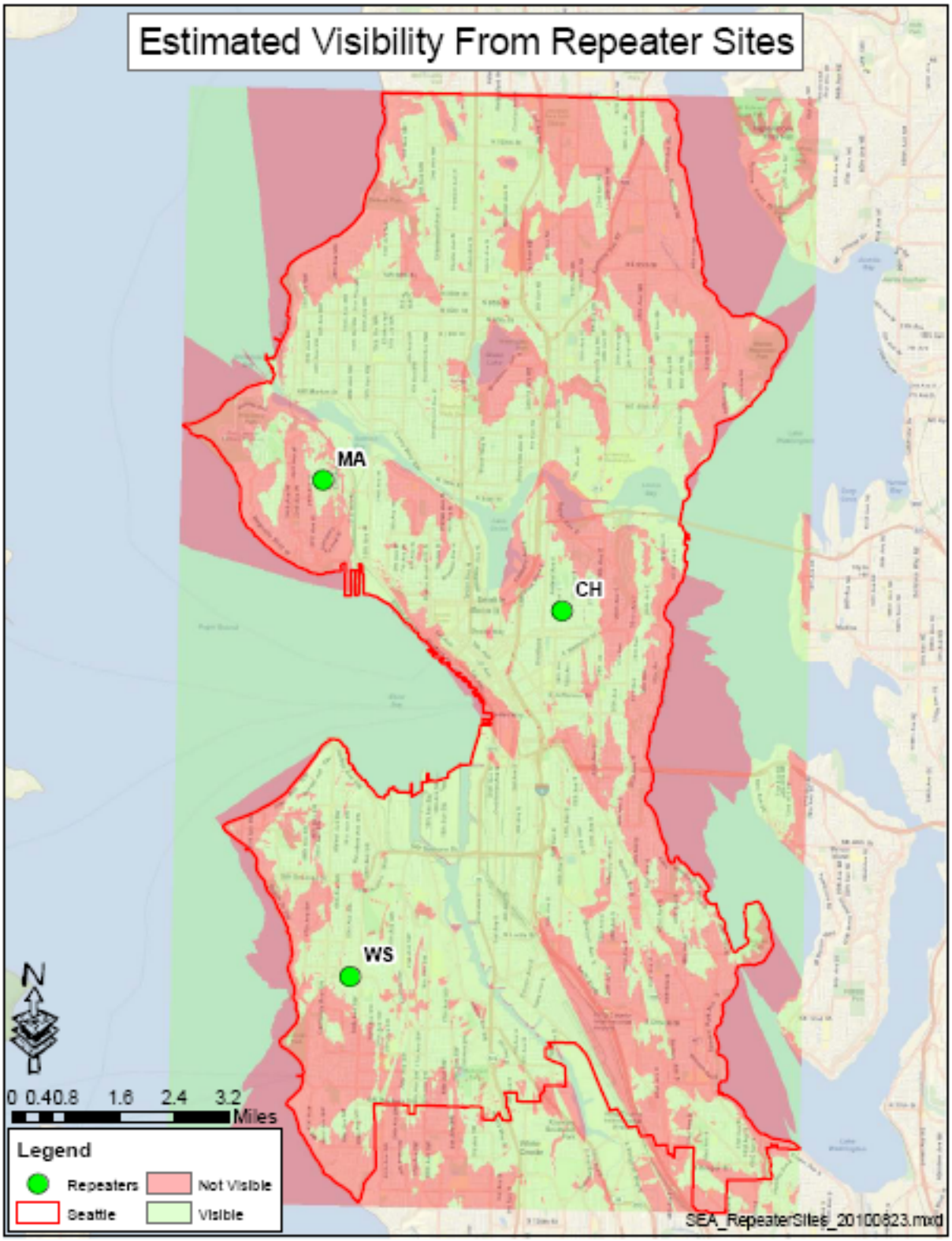
Based on the proposed rules changes, we would have to discard our repeaters and mobile units, and would not be able to replace them due to the Line A restriction. We could retain our existing portable radios, but would have extremely limited Hub to Hub communication without repeaters and the reduced power limits. We would also be in high competition in a disaster for airtime with unlicensed people who would have unrestrained access to the GMRS frequencies. We are concerned about the toll on our volunteers who would have to work around all the shortcomings of a reconstructed system which would comply with the proposed rules changes. These specific changes, in our opinion, are not in the public interest.

Respectfully Submitted

The Seattle Emergency Communications Hubs Leadership Committee:

Janis Ford, Belltown
Angela Wallis, Capitol Hill
John Nordstrand, Fremont
Paul Kostek, Green Lake
Frank Gaul, Magnolia Queen Anne
Peter Shaw, View Ridge
Mary Heim, Wallingford
Cindi Barker, West Seattle
GMRS Repeater Manager, - Ronald Zuber WQJE-383 / KC7RWT

Attachment 1



Attachment 2

West Seattle Emergency Communications Locations
Radio Test December 12, 2008
FRS Radios

	Base	Alki	Admiral	Alaska J	Pigeon Pt	Fairmont	Hansen V	Morgan J	Fauntleroy	EC Hughes
Base heard										
Base heard by										
Alki heard										
Alki heard by										
Admiral heard										
Admiral heard by										
Alaska J heard										
Alaska J heard by										
Pigeon Pt heard										
Pigeon Pt heard by										
Fairmont heard										
Fairmont heard by										
Hansen V heard										
Hansen V heard by										
Morgan J heard										
Morgan J heard by										
Fauntleroy heard										
Fauntleroy heard by										
EC Hughes heard										
EC Hughes heard by										
WSBlog HQ heard										
WSBlog HQ heard by										
Fairmt Sprgs heard										

Reception loud and clear
Reception garbled or faint
No reception

additional location tested after 12/13

Attachment 3

Magnolia Interbay Queen Anne Emergency Communications Hub Sites
Radio Test June 19, 2010
Equipment : ICOM IC F4011
SIGNAL STRENGTH ON SIMPLEX

		Fisher Pavilion	Fisherman's Terminal	Interbay P-Patch	Magnolia Manor Park	Magnolia Thriftway	Queen Anne Bowl	West Magnolia Playfield	West Queen Anne Playfield	Base
1 BRIAN	Fisher Pavilion Receives		1	Ø	2	Ø	4	2	5/3	3
	Fisher Pavilion Transmits									
2 SCOTT	Fisherman's Terminal Receives	3		4	5	0-3	4-5	0-2	3	4
	Fisherman's Terminal Transmits									
3 SIMON	Interbay P-Patch Receives	Ø	5		5	Ø	3	4	1	5
	Interbay P-Patch Transmits									
4 GEORGE	Magnolia Manor Receives	3	5	5		4	4	5	5	5
	Magnolia Manor Transmits									
5 PAM	Magnolia Thriftway Receives	Ø	4	Ø	5		3/4	5	Ø	5
	Magnolia Thriftway Transmits									
* 6 MARK	Queen Anne Bowl Receives	3	5	3	5	Ø		3	4	4
	Queen Anne Bowl Transmits									
7 DARRELL	West Magnolia Playfield Receives	3	5	5	5	5	4		5	5
	West Magnolia Playfield Transmits									
8 ALEX G.	West Queen Anne Playfield Receives	5	2	Ø	4	Ø	3/5	3		4
	West Queen Anne Playfield Transmits									
9 FRANK	Base Receives CORNER BRIANS	4	5	5	5	5	4	5	4	
	Base Transmits & 26TH AVE W.									

Signal Strength Ratings		
	5	Reception Loud and Clear
	4	
	3	Reception Garbled or Faint
	2	
	1	
	0	No Reception

* 6 USED EXTERNAL MAGNETIC - MOUNT ANTENNA ON TOP OF A METAL FENCE AT NORTH SIDE OF SOCCER FIELD ON 50 YARD LINE.

FRANK GAIL
03 JULY 2010.